

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

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UNITED STATES OF AMERICA

v.

RAYMOND MELENDEZ

NO. 5 - 23 CR - 021 - H

INDICTMENT

The Grand Jury Charges:

Count One

Transfer of Obscene Material to a Minor
(Violation of 18 U.S.C. § 1470)

From on or about July 26, 2021, to on or about August 7, 2021, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Raymond Melendez**, defendant, knowingly used a facility and means of interstate and foreign commerce, and transferred, and attempted to transfer, to another individual who had not attained the age of sixteen years, obscene matter, that is: sexually suggestive and sexually explicit messages that appealed predominantly to prurient interest, described sexual conduct in a patently offensive way, and lacked serious literary, artistic, political, and scientific value, to a person Defendant knew and believed to be a minor female who had not attained the age of sixteen years.

In violation of Title 18, United States Code, Section 1470.

Count Two
Transfer of Obscene Material to a Minor
(Violation of 18 U.S.C. § 1470)

On or about July 25, 2021, in the Lubbock Division of the Northern District of Texas, and elsewhere, **Raymond Melendez**, defendant, knowingly used a facility and means of interstate and foreign commerce, and transferred, and attempted to transfer, to another individual who had not attained the age of sixteen years, obscene matter, that is: a photograph of his erect penis that appealed predominantly to prurient interest, depicted sexual conduct in a patently offensive way, and lacked serious literary, artistic, political, and scientific value, to a person Defendant knew and believed to be a minor female who had not attained the age of sixteen years.

In violation of Title 18, United States Code, Section 1470.

Forfeiture Notice
(18 U.S.C. § 2428)

Upon conviction of any offense alleged in the Indictment, and pursuant to 18 U.S.C. § 1467, defendant **Raymond Melendez** shall forfeit to the United States of America: (a) any obscene material produced, transported, mailed, shipped, or received in violation of Chapter 71; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

The above-referenced property subject to forfeiture includes, but is not limited to, a black iPhone, a Samsung tablet, a white iPhone, a silver HP laptop, and a blue HP laptop, seized by law enforcement on April 28, 2022, currently in the possession of law enforcement.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

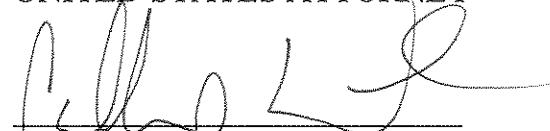
it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 1467(b), to seek forfeiture of any other property of the said defendant up to the value of the forfeitable property described above.

A TRUE BILL



FOREPERSON

LEIGHA SIMONTON
UNITED STATES ATTORNEY



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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

THE UNITED STATES OF AMERICA

v.

RAYMOND MELENDEZ

INDICTMENT

COUNT 1: TRANSFER OF OBSCENE MATERIAL TO A MINOR
Title 18, United States Code, Section 1470.

COUNT 2: TRANSFER OF OBSCENE MATERIAL TO A MINOR
Title 18, United States Code, Section 1470.

(2 COUNTS + FORFEITURE)

A true bill rendered,

Lubbock



Foreperson

Filed in open court this 11th day of April, A.D. 2023

Clerk

ARREST WARRANT TO ISSUE



DeAnn Reno
UNITED STATES MAGISTRATE JUDGE